From:	"Matthew.Lenton	GRO	
Sent:	Thur 07/03/2019 11:41:4	8 AM (UTC)	
То:	Jonathan Gribben	GRO	
Cc:	"pete.newsome GRO "Dave.lbbett(GRO →, Andrew Parsons < GRO	}, Lucy Bremner GRO >, }. "ParkerSPi GRO?
	GRO		}, "ParkerSP <mark>GRO</mark>
Subject:	FW: Roll 2 [WBDUK-AC	.FID123822914]	

Subject:

Jonny,

I've added in the open and close dates of each of the Peaks in the email below; R Roll was employed 05-Mar-2001 to 17-Sep-2004, therefore only the first Peak (highlighted) has any overlap with his period of employment. From what I can understand of that Peak however, it looks like the actual change being referred to was done on 11-Jan-2001, the rest of the call is about trying to obtain an events report, but in the end it appears that they give up as the issue has been fixed.

Matthew Lenton

Post Office Account Document Manager **Business & Application Services**

Fujitsu
Lovelace Road, Bracknell, Berkshire, RG12 8SN
Phone: GRO
Email: GRO
Web: https://www.fujitsu.com/global/
From: Jonathan Gribben {
Sent: Thursday, March 7, 2019 11:08 AM

Sent: Thursday, March	7, 2019 11:08 AM			
To: Lenton, Matthew 🗧	GRO	}		
Cc: Newsome, Pete	GRO	; Ibbett, Dave ∢	GRO	>; Andrew Parsons
GRO	; Lucy Bremner <	GRO	}	
Subject: FW: Roll 2 [WE	3DUK-AC.FID123822914]			

Matthew,

An urgent question has arisen in relation to paragraph 30 of Steve's second statement. In that paragraph Steve states that transactions were only injected into the counter "in the following circumstances while Mr Roll was employed by Fujitsu (emphasis added):-

29.1 fixing a Riposte Index at the counter;

- 29.2 removing a historic message that was influencing the balancing process on a replaced counter;
- 29.3 correcting configuration data after a PinPad change;

29.4 removing redundant configuration items;

29.5 the example given above involving five corrupted bureau transactions; and

29.6 removing historic recovery information."

This is based on the content of row 6 in the table below. Steve's statement goes on to say that this only happened on 14 occasions and only one of those involved transaction data. The 14 occasions were:

PC0175821 {POL-0345994}, [Lenton, Matthew] 19-Feb-2009 - 20-Mar-2009 PC0182141 {POL-0352240}, [Lenton, Matthew] 02-Jun-2009 - 04-Jun-2009 PC0198266 {POL-0368128}, [Lenton, Matthew] 28-Apr-2010 - 16-Jul-2010 PC0201613 {POL-0371420}, [Lenton, Matthew] 15-Jul-2010 - 29-Jul-2010 PC0203896 {POL-0373686}. [Lenton, Matthew] 03-Sep-2010 - 07-Sep-2010

It appears that the 14 occasions actually span the life of Legacy Horizon, rather than the period during which Roll was employed. Is that right?

Please would you get back to me ASAP?

Kind regards Jonny

Jonathan Gribben Managing Associate Womble Bond Dickinson (UK) LLP



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WOMBLE	
BOND DICKINSON Y ID	
From: Matthew.Lenton	
Sent: 25 January 2019 13:02	
To: Jonathan Gribben	
Cc: SHenderson GRO ; Lucy Bremner; ParkerSP GRO ; Dave.Ibbett GRO ;	
pete.newsome gRo Gareth Jenkins { GRO SRO	
Parsons	

Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

Please see below an update which we believe completes the response to action 3 as the remaining 16 incidents referred to yesterday have now been analysed.

Additions in red are additional events not present in the data sent to you on 24-Jan-2019. Changes in text are shown with strikethrough.

Matthew Lenton Post Office Account Document Manager P&PS, Digital Technology Services

Fujitsu Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone: Email: Web: https://www.fujitsu.com/global/

From: Lenton, Matthew

Sent: 24 January 2019 17	7:58			
To: 'Jonathan Gribben' $\{$	GRO			
Cc: 'SHenderson	GRO		; 'Lucy Bremner' {	GRO
GRO >; Parker, Steve	GRO	}; Ibbett, Dave ∢	GRO	; Newsome, Pete
GRO	>; 'Gareth Jenkins	s <	GRO)'
∢ GRO	; 'Andrew Parsons' <	GRO		
Subject: RE: Roll 2 [WBD	UK-AC.FID27032497]			

Jonny,

Please see below, a response is now added for action 3, which we think is mostly complete but will update further. No other changes to the table.

Matthew Lenton

Post Office Account Document Manager P&PS, Digital Technology Services

Fujitsu Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone: Email: **GRO** Web: https://www.fujitsu.com/global/

From: Lenton, Matthev	W			
Sent: 24 January 2019	13:31			
To: 'Jonathan Gribben'	' < GRO			
Cc: SHenderson	GRO ; Lucy Bre	mner	GRO	; Parker, Steve
GRO	>; Ibbett, Dave <	GRO	⊳; Nev	vsome, Pete
GRO	; Gareth Je	nkins <	G	RO
ج GRO	>; Andrew Parsons	5 {G	RO	3
		-		

Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

Please see below revised table with responses added for actions 6 and 8. Actions 3 and 9 are still being worked on, but an update is included in those rows.

Action	Paragraph of Roll 2	Action	Assigned to	Fujitsu
1	8	Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc. [Matthew Lenton] Peak references provided 22-Jan-2019	Fujitsu	Steve / SSC [Matthew Lenton] Completed
2	8	Check what the experts and witnesses say about KEL psteed2847n.	WBD	
3	9	Provide a list of events that give rise to a receipts and payments mismatch Because of the volume of data here (735 incidents) and the need to eyeball each one we're restricted the initial analysis to the 390 calls opened between 1999 and Jan 2002 (inc.). After this the beat rate significantly decreased (only 345 in the subsequent 8 years). This is believed to be due to the version M1 rollout (summer 2001) which appears to have significantly increased the reliability in this area.	Fujitsu	Steve / SSC [Matthew Lenton] Response provided at left. Updated 25- Jan-2019

Analysis	1			1
Category	Calls	Residue	Comment	Event
Orange Prepay Issue	99	291	Jan 2002. Reference data / software issue. Urgent software fix applied within a week.	Software error
Newly migrated offices (paper to PC)	61	230	Oct 1999 – Nov 2001. Hot spots July – Sep 2000, March 2001. Migration figures accepted inevitably lead to R&P issue. No software fault.	Migration
Erroneous settlement of Transfer Out and Transfer In transactions to Cash (KEL DRowe50K)	39	191	April 2001 - June 2001. Corrected cash accounts provided to Post Office Networks (PON). Counter software fix @ release M1, which rolled out from May 2001.	Software error
'Balancing Error: Receipts and payments do not match, please investigate. The error may be corrected using Reversal Function. WARNING: Continuing may lead to an unbalanced Cash Account"	14	177	March 2001 – July 2001. Reconciliation data has been provided to PON (suspect this was corrected cash accounts). Counter software fix @ release M1, which rolled out	Software error

(KEL DRowe1625K)			from May 2001.		
Stock unit being rolled over twice before the Cash Account is rolled. (KEL LKiang1222L, GMaxwell159r)	8	169	March 2001 – May 2001. Corrected cash accounts provided to PON. Counter software fix @ release M1, which rolled out from May 2001.	Software error	
Single Counter Outlet (SCO) was replaced, without synchronising the messagestore. (KEL JBallantyne5328R)	17	152	November 2000 – November 2001. Reconciliation Data provided to PON. Mismatch between receipts and payments is due to a self originated message which overwrote a transaction on the counter messagestore. MSU noted in Nov 2001: This type of R & P incident is the only one we still get regularly. Is there anything that can be/is being done to fix it? Software fix @ release BI2.	Software error	
Software fixes. May be related to above KELs, or other issues.	27 29	125 123	April 2000 – December 2001. 12 @ Cl4. 10 @ M1. 5 @ other. 7 @ other.	Software error	

Reference data. Either rollout timetable not followed, resulting in unavailable local products such as OBCS, or products ending and stock remaining.	13	112 110	July 2000 – December 2001. OBCS products- will have- become- available, later- than expected.	Reference Data Error	
Duplicate incidents- within the set- being analysed e.g. branch reports- the same issue- flagged on- Fujitsu's host cash- account report, or- vice versa	34	78 76	September 2000 – December 2001.	Admin Ignore	
Reconciliation resolved. May be related to above KELs, or other issues.	41	37 35	August 2000 – December 2001. Identified by data centre reporting. Root cause cannot be determined from Peak Information provided to POL to give correct view of accounts	Unknown	
No fault, not R&P Peaks, etc	11	26 24	September 2000 – January 2002	Admin Ingore	
Temp Closed offices	5	21 19	May 2001 – January 2002 Correct outlet close process not followed. Information archived (e.g. Balance brought forward) by system.	POL Process Error	

		Hardware swaps	5	16	July 2000 –	Engineering-		
			9	10	October 2001 May 2000 –	process- error		
					November 2001			
		User	4	6	August 2000 – July 2001 A&G for PM or Trainers, which sometimes wasn't followed (PC0065358). PM ignoring on	Training		
					screen messages (PC0053164). One call where PM accepted shortage, then a call was raised (PC0067250), possibly indicating lack of understanding. Another call (PC0068191) reads like lack of PM understanding of the Cash Account.			
		Unclear For 2002, 101 of the						
		January. 99 of those was opened in Febru	iary.				WBD to	
4		Did Post Office revie software issues.	WICA	volumes ir	r order to identify p	otential	wBD to pick up with POL	
5	16	Review the contract SLAs/penalties.	betwee	en POL an	d Fujitsu and sumr	narise	WBD	

6	20		list of reasons for which transaction the counter.	on data would need to be	Fujitsu	Steve / SSC Can this be
			h Riposte index at counter	Potential financial impact because the wrong value or quantity was being used for a product		ascertained from the sampling referred to below at 9? [Matthew Lenton]
		was incor	oric message stored at counter crectly being considered as part ncing process	No financial impact. PM recognised that data presented was too old.		Response provided at left, 24-Jan- 2019.
		be delete	ata relating to PinPad needs to ed if PinPad is removed from AKA PinPad LPO delete.	No financial impact		
			guration objects local to counter o be removed. te.	No Financial impact		
		Five corru counter	upted bureau transactions on	Financial impact (PC0175821) Changes approved by POL Documented on BIMS		
		same / ne product r removed	P recovery for too long. Usually ext day not months. Ref data for referenced in AP recovery . Impossible for PM to complete . Objects deleted. LPO delete	Possible but unlikely financial impact due to age of recovery information.		
		Riposte sy Note: Last relates to	al Persistent object. Configurations stem. By its nature, requires inter case (RiposteObject command) s configuration information (simila any financial impact so is for comp	vention at counter. till being worked on. This r to LPO above) and will		
			ned the following databases to try transaction data has been inserte	•		
		OCP: Oper	n Error Log rational Change Processes OCR / (dent management system	DCP		
		System	Search Keywords			

		KEL	RiposteMessageFile			
		KEL	LPO Delete			
		KEL	Marooned			
		ОСР	Riposte Message File			
		OCP	LPO Delete			
		OCP	Marooned			
		OCP	RiposteObject put			
		Peak	RiposteMessageFileRiposteMessage			
		Peak	LPO Delete			
		Peak	JBallant498J			
		Peak	MYoung5043M			
		Peak	Marooned			
		Peak	RiposteObject put			
7	20	Review Pe into counte	eak reference 107043 (example of trans er).	action being injected	WBD	
8	21	transaction now?	elfast team; and (2) privileged users hav n data between 2001 and 2004? Do the nkins: With Horizon Online, there is the	y have that ability	<u>Fujitsu</u>	[Matthew Lenton] Response
		Correction	Tool which can inject transactions and	this is controlled by		provided at left, 24-Jan-
			audited when it runs and we have only u DBAs in Belfast can in theory do anyth			2019.
		practice th	hey will run scripts tested by dev as part	of a systems		
			f DB changes are required. Any such act 5 the actual commands run are also aua			
			Horizon, control was weaker. SSC could	inject into		
		correspon	ndence Servers and also at the counter.			

		Belfast team:Belfast had administrative access to the correspondence servers and had a theoretical ability to inject data into the messagestores, but don't believe that they had the technical understanding to do so.Belfast had no access to counters, UNIX/NT team having no users and no knowledge of administrative user accounts/passwords.They would not have injected any data unless it happened to be done by scripts that they were asked to run and which were provided under change control. Direct manipulation of the messagestore wasn't something that they knew how to do and would not have attempted to do lest it break the running applications which harvested/inserted data. Their understanding of the actual messages was very low/non- existent so would have had no confidence in making any insertion.		
9	21	Review a sample of OCPs to give an indication as to how frequently transaction data was injected. [Matthew Lenton] This is proving difficult to provide. The original plan was to examine sample months of change control data and produce rough figures. As Pete Newsome already discussed with you, this lead to it becoming apparent that support did not use formal change control in the earlier years for BAU support actions. We relied on the audit trail within the incidents (Peaks) to document support actions. We had auditability of the work done but no change control entries. We assume that the reasoning behind this was to allow implementation of support actions ASAP, and the audit trail being good enough where there was no financial impact. Therefore we are still looking at how / if we can provide an accurate answer to this question for the earlier years.	Fujitsu	Steve / SSC – relates to 6 above? [Matthew Lenton] Update at left.
10	22	Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example).	WBD	
11	General	Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available? [Matthew Lenton] Answered 22-Jan-2019	Fujitsu	Matthew [Matthew Lenton] Completed

Matthew Lenton Post Office Account Document Manager P&PS, Digital Technology Services

Fujitsu Lovelace Road, Bracknell, Berkshire, RG12 8SN Phone: Email: Bradil: Web: https://www.fujitsu.com/global/

From: Jonathan Gribben	GRO		
Sent: 24 January 2019 09	:56		
To: Lenton, Matthew	GRO	>	
Cc: SHenderson G	RO ; Lucy Bremner	GRO	; Parker, Steve

4	GRO	; Ibbett, Dave ∢	GRO	; Newsome, Pete	
<[GRO			GRO	·····`
<	GRO	>; Andrew Parsons ∢	GRO		
Subjec	t: RE: Roll 2 [WBI	DUK-AC.FID27032497]			
Import	ance: High				

Matthew,

Please would you provide an update in relation to the below this morning?

Kind regards Jonny

Jonathan Gribben Managing Associate Womble Bond Dickinson (UK) LLP



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From: Matthew.Lenton	GRO		
Sent: 22 January 2019 15:4	46		
To: Jonathan Gribben			
Cc: SHenderson GRO	; Lucy Bremner; Parl	<pre>kerSP(GRO ; Dave.Ibbett</pre>	GRO ;
pete.newsome GRO	; Gareth Jenkins	GRO	
Subject: RE: Roll 2 [WBDU	K-AC.FID27032497]		

Jonny,

I've numbered the actions 1 - 11 below, and added the responses so far to actions 1 and 11 in the Actions column, and some notes on progress etc. to the Fujitsu column.

Matthew Lenton Post Office Account Document Manager P&PS, Digital Technology Services

From: Jonathan Gribben [GRO			
Sent: 21 January 2019 17:3	39				
To: Parker, Steve	GRO	>; Ibbett, D	ave GI	RO;	Newsome, Pete

GRO	>; Lenton, Matthew <	GRO	; Gareth Jenkins
<	GRO		
Cc: Simon Henderson	GRO		; Lucy Bremner
<>			

Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Dear all,

Privileged & Confidential

Thank you for your time earlier. Here's a list of the actions that I captured from today's calls. Please let me know if there's anything you'd like to add or change:-

Action Paragraph of Roll 2	Action	Assigned to	Fujitsu
	Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc. <i>The Peaks referenced below</i> <i>PC0100174 March 1st 2004 to 5th March 2004</i> <i>FAD317309 reporting: Horizon Kit rebooting itself for</i> <i>no apparent reason.</i> <i>Helpdesk user: "Over the past 2-3 weeks engineers</i> <i>have been to site and have replaced 2xBU's and</i> <i>2xPSU's but the problem persists."</i> <i>BU = base units = PC itself. PSU = Power supply units</i> <i>within the base units</i> <i>RR "Evidence (from event logs) shows that the power</i> <i>is being switched off every morning shortly (ie 5 or 6</i> <i>minutes) before the PM logs on"</i> <i>RR: "After carrying out tests on our rigs, I have been</i> <i>able to duplicate the problem here on ONE of our</i> <i>rigs but not on others. It seems that the Screen</i> <i>Power Button is incorrectly connected to the</i> <i>motherboard."</i> <i>RR: "We have now identified two instances of this,</i> <i>one in live. This is a hardware build quality issue."</i> <i>This was followed by:</i> <i>PC0100899 18th March 2004 to 24th March 2004.</i> <i>Hardware returned from site to Bracknell for</i> <i>examination.</i> <i>RR: "Tests carried out on screen power switch -</i> <i>working correctly, no further action required."</i> <i>Your questions 2d,e,f,g</i> d) Is his example true, or could it have been true: Yes. Can find no data on the origin for the statement: "This is a hardware build quality issue". Could be a discussion with engineering which was not recorded on the incident progress. Information we have only describes the hardware issue being seen internally to FJ on one instance of test rig hardware. No hardware	Fujitsu	Steve / SSC [Matthew Lenton] Details of Peaks provided at left.

		error proved on the site.		
		If so, how often did that sort of problem occur: Very		
		rare. Only one other found using keywords		
		"standby", "laptop", "luggable". PC0055550 which		
		was a problem on prototype hardware going into		
		standby mode.		
		What would have caused it: Inconclusive. No		
		information on root cause of issue reported by the		
		Post Master onsite. Could be a hardware problem,		
		could be user miss-operation of hardware.		
		Could it have affected/did it affect branch accounts:		
		No. Once powered on the unit would function as		
		normal.		
		If so, might its effect on branch accounts never have		
		been detected with the result that some SPMs might		
		have been wrongly held liable for false deficits: No		
		e) Would Rolls have disassembled laptops and done		
		the other things he describes in para 8: Have to		
		assume he did as per the incident updates. I expect		
		he had some assistance (especially with kit on test		
		rigs - different team totally) but unable to		
		substantiate.		
		Would he have had/did he have the conversation		
		with his manager he describes in para 8: Just can't		
		answer this. My analysis of the issue would suggest		
		that it turned out to be unimportant because there		
		was no proof that this ever happened in the live		
		estate and that his comment of "This is a hardware		
		build quality issue" is simply conjecture. However, he		
		may have discussed with engineering and truly		
		discovered a batch of faulty hardware. I would have		
		expected an update in the incident reading		
		"Discussed with xxxxxxx in engineering and we		
		determined that Bad batch etc" No such		
		updates are present.		
		f) Was the problem referred to in para kept secret,		
		as claimed at the end of para 8: No evidence either		
		way. I would not expect that to be the case. It is not		
		in Fujitsu's interest to have faulty equipment that is		
		not corrected damaging reputation.		
		g) Would Fujitsu management have known/did it		
		know about this problem? Would/did Post Office?		
		If not, why not: No way of knowing. Information no		
		longer exists		
2	8	Check what the experts and witnesses say about KEL	WBD	
		psteed2847n.		
3	9	Provide a list of events that give rise to a receipts and payments mismatch.	Fujitsu	Steve / SSC Examples only, or all
		paymonto miomatori.		scenarios that caused them
				in reality?
L	1	1		1

				[Matthew Lenton] May take rest of this week or more. Requires eyeball searching.
4	12	Did Post Office review TC volumes in order to identify potential software issues.	WBD to pick up with POL	
5	16	Review the contract between POL and Fujitsu and summarise SLAs/penalties.	WBD	
6	20	Provide a list of reasons for which transaction data would need to be injected at the counter.	Fujitsu	Steve / SSC Can this be ascertained from the sampling referred to below at 21? [Matthew Lenton] SSC forming a query to find this from OCP data, also determining when transaction would be injected at the counter.
7	20	Review Peak reference 107043 (example of transaction being injected into counter).	WBD	
8	21	Did: (1) Belfast team; and (2) privileged users have the ability to inject transaction data between 2001 and 2004? Do they have that ability now?	Fujitsu	Gareth: answer 1 and 2 and perhaps explain again difference between old and new?
9	21	Review a sample of OCPs to give an indication as to how frequently transaction data was injected.	Fujitsu	Steve / SSC – relates to 20 above? [Matthew Lenton] See action 6 above
10	22	Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example).	WBD	
11	General	Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available? [Matthew Lenton] Emails cannot be retrieved from the accounts of former Fujitsu employees from that period, and back ups are not held for that period of time. The only records of such a person's emails would be if they are part of a current employee's email account or pst archive, in which case it would be only the subset of their emails that were to or from the other user. Similarly, for other documentation that was held locally be individual employees on their laptops, that would have been	Fujitsu	Matthew [Matthew Lenton] See answer at left

deleted when the user left. As we have already seen, some limited information from this period does exist, stored in Dimensions and other networked repositories, some of which we have already provided in connection with this case.	
--	--

We are aiming to get a draft response to Roll 2 into circulation by early tomorrow afternoon.

Kind regards Jonny

Jonathan Gribben

Managing Associate Womble Bond Dickinson (UK) LLP



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From: Jonathan Gribben				
Sent: 21 January 2019 11	:05			
To: 'ParkerSP(GRO	'; Dave.Ibbett	GRO ; pete.newsor	ne(GRO	;
Matthew.Lenton GRO	; Gareth Jenkins	[GRO	
Cc: Simon Henderson	GRO	; Lucy Bremner		
Subject: Roll 2 [WBDUK-A	AC.FID27032497]			

Privileged & Confidential To discuss

Jonny

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